



LANDAU
ASSOCIATES,
INC.

Geoenvironmental Engineering and Technologies

COLSF 8.4 V1

RECEIVED

JUL 8 1992

July 7, 1992

SUPERFUND

Mr. Mike Kuntz
Washington State Department of Ecology
P.O. Box 47600 M/S PV-11
Olympia, WA 98504-8711

RE: COLBERT LANDFILL RD/RA
PROGRESS REPORT
SECOND QUARTER 1992

Dear Mr. Kuntz:

Presented herein is the Second Quarter (April, May, June) 1992 Progress Report for the Colbert Landfill RD/RA Superfund Project (Project), which was prepared by Landau Associates, Inc., Spokane County's engineering consultant. This progress report addresses the reporting requirements specified in Section XI of the Project Consent Decree, including:

- Remedial action activities commenced or completed during the reporting period
- Remedial action activities projected to be commenced or completed for the Third Quarter (through September) 1992
- Any problems that were encountered or are anticipated.

1.0 ACTIVITIES COMMENCED/COMPLETED DURING REPORTING PERIOD

Activities commenced and/or completed during this reporting period include response to Ecology and EPA comments on Preliminary Phase II work plans, preparation of a technical memorandum regarding additional sampling to assess NPDES monitoring requirements, and initiation of additional bench scale testing to evaluate scale control alternatives. Specific activities performed during the reporting period included:

- EPA and Ecology comments were received^(a) on the Project Health and Safety Plan (April 29, 1992), the Quality Assurance Project Plan (April 13, 1992), the Preliminary Phase II Groundwater Monitoring Plan (April 27, 1992), the Preliminary Phase II Extraction Well Plan (April 29, 1992), and the Preliminary Phase II Treatment and Discharge Plan (April 28, 1992).
- EPA and Ecology work plan comments were reviewed and responded to as follows:

USEPA SF



1454861

(a) EPA/Ecology comment letter dated as indicated in parentheses.

- Project Health and Safety Plan: EPA and Ecology Comments will be considered prior to finalizing the Plan. However, none of the comments require a revision to the draft Plan or a written response.
- Responses to EPA and Ecology comment on the Preliminary Phase II Groundwater Monitoring Plan and Preliminary Phase II Extraction Well Plan were provided by Landau Associates in letters dated June 17, 1992 and June 8, 1992, respectively. Both plans will be finalized by early July in preparation for Phase II drilling activities, which are anticipated to commence in early August.
- Ecology comments on the Treatment and Discharge Plan identified a number of potential NPDES criteria for effluent discharges to the Little Spokane River that were not considered during selection of the remedial action. Spokane County sent a letter to Ecology indicating that Phase II design could not continue until the NPDES issues were resolved, and it was confirmed that the Ecology-selected remedial action could achieve discharge criteria.
- A meeting was held June 19, 1992 at Ecology's offices in Lacey, Washington, to discuss the NPDES issues. Meeting attendees included Ecology, EPA, Spokane County and Landau Associates representatives. The following action items resulted from the meeting:
 - EPA and Ecology do not believe the Force Majeure provisions of the Project Consent decree apply to the cessation of design activities resulting from the impact of potential NPDES criteria on remedial action effectiveness. However, EPA and Ecology recognize that the present uncertainties make continuation of treatment system design impracticable, and will consider a request to cease design activities for those portions of the Phase II design that may be impacted by NPDES discharges criteria.
 - The parameters identified as NPDES criteria in Ecology's Treatment and Discharge Plan comments are only considered potential criteria and will be eliminated from future consideration if not present in anticipated Phase II discharge water above the laboratory practical quantitation limit (PQL) or at a concentration of concern, whichever is higher.
 - Landau Associates (for Spokane County) will submit a technical memorandum identifying potential NPDES monitoring parameters, listing available groundwater quality data for these parameters, and describing proposed surface water and groundwater sampling and analyses to characterize previously untested potential NPDES parameters.
 - Spokane County will submit a technical memorandum subsequent to implementing the sampling and analyses previously describe. The memorandum will present the analytical results, compare the analytical results to potential NPDES criteria, identify parameters besides the identified Project Constituents of Concern (if any) that are present at concentrations requiring further consideration as NPDES monitoring criteria, and indicate whether addressing these parameters may require modification to the selected remedial action. (Note: Spokane County has not agreed to implement or fund any groundwater treatment beyond that described in the Project Consent Decree).

- A technical memorandum was prepared by Landau Associates and submitted to EPA and Ecology on June 26, 1992, presenting available data and describing proposed additional groundwater and surface water sampling and analyses for evaluation of potential NPDES parameters.
- Bench scale tests were initiated to better characterize the performance of acid addition and sequestering agent addition for scale control. Results of the bench scale tests will be provided in the Final Phase II Treatment and Discharge Plan.
- Preparation of the request for bid for Phase II drilling services was initiated. It is anticipated that a driller will be selected by late July, and Phase II well drilling initiated by early August, provided NPDES issues are adequately resolved by that time.

2.0 ACTIVITIES/PROJECTS TO BE COMMENCED/COMPLETED DURING NEXT REPORTING PERIOD

As specified in Section XI of the Project Consent Decree, the next reporting period extends through the Third Quarter (September) of 1992. Anticipated activities for the next reporting period include:

- Initiate the scope described in Landau Associates' June 26, 1992 memorandum, subsequent to concurrence by EPA and Ecology (by mid July).
- Submit the technical memorandum for EPA and Ecology review describing the results of the NPDES criteria assessment (by late August).
- Finalize the Phase II Groundwater Monitoring and Extraction Well Plans (by mid July).
- Select a drilling contractor for construction of Phase II monitoring and extraction wells (by late July).
- Initiate construction of Phase II monitoring and extraction wells (by mid August).
- Continue design of the Phase II remedial action for those components not contingent on the resolution of NPDES issues.

3.0 ENCOUNTERED/ANTICIPATED PROBLEMS

A significant issue has arisen regarding NPDES discharge criteria that has the potential to significantly effect Phase II design and the schedule for implementation of the Phase II remedial action. The nature, scope, and potential Project impacts of these NPDES issues have been addressed in correspondence, meetings, and technical memoranda, and will not be further detailed in this progress report. EPA and Ecology are cognizant of the issues, and that resolution of these issues is required before design of the remedial action can be completed.

This report describes progress on only the primary Project remedial action activities. There are peripheral activities associated with the primary activities that are not described herein. If clarification is required for any of the activities presented in this progress report, or if additional information is desired for peripheral activities, please contact me or Dean Fowler (Spokane County).

LANDAU ASSOCIATES, INC.

By:

Michael A. Stomaszko

for Lawrence D. Beard, P.E.
Project Manager

LDB/njb
No. 124001.60

cc: Neil Thompson, U.S. EPA
Dean Fowler, Spokane County
Lyle Diedieker, Ecology and Environment, Inc.